

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

**[PROPOSED] ORDER ON  
MOTIONS TO SEAL AND  
MOTION FOR LEAVE TO  
FILE THIRD AMENDED  
CONSOLIDATED  
COMPLAINT**

This matter comes before the Court on Motion for Leave to File Under Seal Plaintiffs' Memorandum in Support of Motion for Preliminary Approval of Settlement with WMS and Peco Defendants (ECF 549), Motion for Leave to File Third Amended Consolidated Complaint (ECF 567), and Motion for Leave to File Under Seal Plaintiffs' Memorandum of Points and Authorities in Support of Their Amended Motion for Leave to File Third Amended Consolidated Complaint (ECF 569). Plaintiffs request leave to file a Third Amended Consolidated Complaint, and Defendants do not oppose Plaintiffs' request. Defendants request that the Court order that the unredacted versions of the following documents shall remain under seal: (1) the Declaration of G. Jonathan Meng ("Meng Declaration"), (2) Plaintiffs' Memorandum of Points and Authorities in Support of Their Amended Motion for Leave to File Third Amended Consolidated Complaint ("Memorandum"), (3) Exhibit 1 to the Memorandum, Plaintiffs' proposed Third Amended Consolidated Complaint ("TAC"), and (4) Exhibit 3 to the Memorandum, a redline comparing the TAC to the operative Complaint ("Redline TAC"). Defendants further request that the Court order

Plaintiffs to file the Meng Declaration, the Memorandum, the TAC, and the Redline TAC, bearing the agreed-upon redactions as reflected in Exhibits A, B, C, and D to Defendants' Response to Plaintiffs' Motions to Seal, on the public docket.

Upon consideration of the Motions, the papers submitted in support and in response thereto, and good cause appearing, the Motions are GRANTED.

This Court HEREBY ORDERS that the unredacted Meng Declaration, the Memorandum, the TAC, and the Redline TAC shall remain under seal.

This Court FURTHER ORDERS that Plaintiffs shall file the Meng Declaration, the Memorandum, the TAC, and the Redline TAC, bearing the agreed-upon redactions as reflected in Exhibits A, B, C, and D to Defendants' Response to Plaintiffs' Motions to Seal, on the public docket.

This Court FURTHER ORDERS that Plaintiffs are no longer required to, and shall not, file redacted versions of the memorandum, and exhibits to the memorandum, in support of the original Motion for Leave to File Third Amended Consolidated Complaint, which was filed on December 17, 2021 (ECF 544) and withdrawn on January 20, 2022 (ECF 566).

Pursuant to Local Rule 103, an additional copy of the Third Amended Consolidated Complaint does not need to be filed. The Third Amended Consolidated Complaint will be deemed to have been served on the date that the Court has granted leave for its filing.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. STEPHANIE A. GALLAGHER  
UNITED STATES DISTRICT JUDGE